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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TERRAFORM LABS PTE LTD., DO KWON,

Plaintiffs,

v.

SECURITIES AND EXCHANGE COMMISSION,

Defendant.

Hon. J. Paul Oetken

1:21-cv-08701-JPO

**SECURITIES AND EXCHANGE COMMISSION'S NOTICE OF
MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Securities and Exchange Commission ("SEC"), hereby moves this Court for an order dismissing the complaint for lack of subject matter jurisdiction pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure.

Date: December 27, 2021

/s/ Kevin Solonsky
Kevin Solonsky
Senior Counsel